

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
LUFKIN DIVISION

FILED-CLERK
DISTRICT COURT
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TOMMIE WELLS, JR. and
CHERYL WELLS

V.

NACOGDOCHES COUNTY, TEXAS and
EDWARD THORNTON

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CIVIL ACTION NO. 9:00CV142
JUDGE: HOWELL COBB

**DEFENDANTS' FIRST AMENDED
DESIGNATION OF EXPERT WITNESSES**

TO THE HONORABLE JUDGE OF SAID COURT:

Come now Defendants Nacogdoches County and Edward Thornton, and file this
their Designation of Expert Witnesses:

I.

EXPERT DESIGNATIONS

1. Mr. Bennie Serrano
Nacogdoches Health and Environmental Services
Nacogdoches County Courthouse
101 West Main, Suite 112
Nacogdoches, Texas 75961

Mr. Serrano is a mixed fact and expert witness. The factual basis for his knowledge has previously been disclosed. His report and other required disclosures have been provided to Plaintiffs counsel.

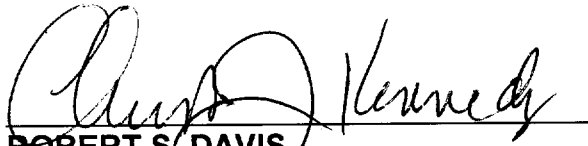
Defendants reserve the right to call any experts listed by the other parties to this lawsuit. Defendants also reserve the right to supplement as allowed by this honorable Court.

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Respectfully submitted,

FLOWERS DAVIS, P.L.L.C.

815 Rice Road
Tyler, Texas 75703
(903) 534-8063
(903) 534-1650 Facsimile

A handwritten signature in black ink, appearing to read "Robert S. Davis", written over a horizontal line.

ROBERT S. DAVIS

State Bar No. 05544200

CHRISTI J. KENNEDY

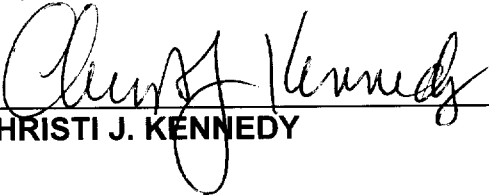
State Bar No. 00787772

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that the above and foregoing instrument was served upon Curtis B. Stuckey of Stuckey, Garrigan & Castetter, 2803 North Street, P. O. Box 63190, Nacogdoches, Texas 75963-1902, counsel of record for Plaintiff in the above entitled and numbered cause this the ^{19th}~~18th~~ day of November, 2001, in the following manner:

- ☒ Via Facsimile
- ☒ Via Certified Mail, Return Receipt Requested _____
- ☐ Via First Class Mail
- ☐ Via Federal Express
- ☐ Via Hand Delivery



CHRISTI J. KENNEDY